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Attorneys for Plaintiff  
Ivy Bridge University, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IVY BRIDGE UNIVERSITY, LLC f/k/a  
Ivy Bridge College, LLC, a Delaware  
corporation,

Plaintiff,

v.

HIGHER LEARNING COMMISSION, an  
Illinois corporation, and Does 1 through  
25, inclusive,

Defendants.

Case No. 3:15-cv-02187 SC

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO SET A REVISED BRIEFING  
SCHEDULE AND CONTINUE HEARING**

1 WHEREAS, on May 14, 2015, Ivy Bridge University, LLC's ("Ivy Bridge") filed the  
2 Complaint in this action and on May 19, 2015 effected service on defendant Higher Learning  
3 Commission ("HLC");

4 WHEREAS, Ivy Bridge agreed to extend HLC's time to answer, move, or otherwise  
5 respond to the Complaint to Monday, July 13, 2015;

6 WHEREAS, on July 13, 2015, HLC filed a Motion to Dismiss the Complaint;

7 WHEREAS, Ivy Bridge pursuant to N.D. Cal. Local Rule 7-3(a) would normally have 14  
8 days to respond after the Motion to Dismiss is filed;

9 WHEREAS, the hearing on HLC's Motion to Dismiss was set for calendar on August 28,  
10 2015;

11 WHEREAS, due to travel schedules and other conflicts the parties have agreed to the  
12 below proposed schedule pursuant to N.D. Cal. Local Rule 6-1(a);

13 Now therefore, the parties, through the undersigned counsel, hereby stipulate as follows:

14 (1) Ivy Bridge will respond to HLC's Motion to Dismiss on August 26, 2015.

15 (2) HLC's deadline to reply to Ivy Bridge's response will be extended to September 9,  
16 2015.

17 (3) The hearing on HLC's Motion to Dismiss will be continued to September 25, 2015 or  
18 as soon thereafter as the matter may be heard.

19 **IT IS SO STIPULATED.**  
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1 July 17, 2015

**PERKINS COIE LLP**

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3 By: /s/ Patrick Corrigan  
Patrick Corrigan (SBN 240859)  
pcorrigan@perkinscoie.com

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5 Attorneys for Plaintiff  
Ivy Bridge University, LLC

6  
7 July 17, 2015

**ELLIOTT GREENLEAF P.C.**

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9 By: /s/ Gregory S. Voshell  
Gregory S. Voshell (*pro hac vice*)  
gsv@elliottgreenleaf.com

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11 Attorneys for Defendant  
Higher Learning Commission

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13  
14 I, Patrick Corrigan, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that the  
15 concurrence to the filing of this document has been obtained from each signatory hereto.

16  
17 July 17, 2015

**PERKINS COIE LLP**

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19 By: /s/ Patrick Corrigan  
Patrick Corrigan (SBN 240859)  
pcorrigan@perkinscoie.com

20  
21 Attorneys for Plaintiff  
Ivy Bridge University, LLC

~~PROPOSED~~ ORDER

**PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES, IT IS SO ORDERED:**

(1) Ivy Bridge will respond to defendant HLC's Motion to Dismiss on August 26, 2015.

(2) Defendant's deadline to reply to Ivy Bridge's response is extended to September 9, 2015.

(3) The hearing will be continued to September 25, 2015.

